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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JPMORGAN CHASE BANK, N.A., a  
national banking association,

Plaintiff,

vs.

SFR INVESTMENTS POOL 1, LLC, a  
Nevada limited liability company; THE  
WILLOWS HOMEOWNERS'  
ASSOCIATION, a Nevada non-profit  
corporation; DANIEL A. RICHARD, an  
individual,

Defendants.

Case No. 2:17-CV-00324-GMN-PAL

**STIPULATION AND ORDER TO  
EXTEND SCHEDULING ORDER  
DEADLINES BY 30 DAYS**

**(First Request)**

1 SFR INVESTMENTS POOL 1, LLC, a  
2 Nevada limited liability company,

3 Counterclaimant/Cross-Claimant,

4 vs.

5 JPMORGAN CHASE BANK, N.A.;  
6 DANIEL A. RICHARD, an individual,

7 Counter-Defendant/Cross-Defendants.

8 Pursuant to LR IA 6-1 and LR 26-4, Plaintiff/Counter-Defendant JPMorgan  
9 Chase Bank, N.A. ("Chase"), Defendant/Counterclaimant/Cross-Claimant SFR  
10 Investments Pool 1, LLC ("SFR"), and The Willows Homeowners Association  
11 ("Willows"), by and through their respective counsel of record, stipulate and request  
12 that this Court extend discovery and dispositive motion deadlines in the above-  
13 captioned case for 30 days, to permit the parties to efficiently complete party  
14 depositions and outstanding written discovery. The parties have conferred and agree  
15 that this brief extension is the most reasonable, most economical, and least  
16 burdensome way to complete discovery in this case.

17 This is the parties' first request for an extension to the scheduling order  
18 deadlines, which were submitted in compliance with LR 26-1. The parties make this  
19 request in good faith and not for purposes of delay.

20 **I. Discovery Completed to Date**

21 To date, Chase has served the following discovery: initial disclosures; initial  
22 expert disclosure; requests for production to SFR; interrogatories to SFR; notice of  
23 Rule 30(b)(6) deposition of SFR; requests for production to Willows; interrogatories to  
24 Willows; notice of Rule 30(b)(6) deposition of Willows; subpoena to produce  
25 documents on non-party Absolute Collection Services, LLC; and subpoena to testify  
26 at a deposition on non-party Absolute Collection Services, LLC.

27 To date, SFR has served the following discovery: initial disclosures; requests  
28 for production to Chase; interrogatories to Chase; requests for admission to Chase;

1 and notice of Rule 30(b)(6) deposition of Chase.

2 To date Willows has served the following discovery: requests for production to  
3 Chase; interrogatories to Chase; and requests for admission to Chase.

4 **B. Specific Description of Discovery that Remains to be Completed**

5 The parties are awaiting responses to the served discovery requests. In  
6 addition, they are working to schedule party and non-party depositions. Chase has  
7 scheduled the deposition of SFR for December 4, 2017, of Willows for December 4,  
8 2017, and of Absolute Collection Services, LLC for November 22, 2017. SFR has also  
9 noticed a Rule 30(b)(6) of Chase. As discussed below, however, the parties seek to  
10 schedule Chase's deposition to occur after the current discovery cutoff of December 4,  
11 2017.<sup>1</sup>

12 **C. Good Cause Exists for the Requested Extension**

13 Good cause exists for the requested extension, as it will provide time for the  
14 parties to complete written discovery and schedule depositions in a way that  
15 minimizes burden and increases efficiency. SFR has served voluminous written  
16 discovery requests on Chase. While Chase requires additional time to respond to  
17 SFR's discovery, Chase's current response deadline December 4, 2017—*i.e.*, the last  
18 day of the discovery period. SFR is willing to provide Chase with a two-week  
19 extension for its responses, but it cannot do so unless discovery is extended.

20 Additionally, SFR has noticed Chase's deposition for November 29, 2017, but  
21 Chase's Rule 30(b)(6) designee is unavailable on this date because the designee will  
22 be testifying in five other depositions in similar lawsuits involving Chase and SFR,  
23 on not only November 29 but also on November 28 and 30. The parties have met and  
24 conferred about rescheduling the deposition in this lawsuit to take place during  
25 December 12-14, 2017, when the Chase designee will be available and in Las Vegas.

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26  
27 <sup>1</sup> The parties further reserve their rights to meet and confer and, if necessary, engage  
28 in motion practice regarding any discovery issues that may arise.

This approach will significantly minimize the cost and burden to the witness. Moreover, scheduling the Chase deposition during this time period will also allow SFR to obtain Chase's written discovery responses before deposing Chase, a logical process that will enable SFR to conduct an efficient, productive, and targeted deposition. SFR anticipates that it will be able to significantly limit the scope of the deposition based on the responses to its written discovery.

Finally, this is the parties' first request to extend the standard, 180-day discovery period in this case, and they seek only a brief 30-day extension. The parties have diligently engaged in discovery to date and seek this extension in good faith.

**D. Proposed Discovery Deadlines**

The parties request an order extending the close of discovery, the deadline to file dispositive motions, and the deadline to file a pre-trial order by 30 days.

Event	Current Deadline <sup>2</sup>	New Deadline
Close of Discovery	December 4, 2017	January 4, 2018
Dispositive Motions	January 3, 2018	February 5, 2018
Pre-Trial Order	February 2, 2018	March 2, 2018

*[continued on next page]*

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<sup>2</sup> See Scheduling Order, ECF No. 30.

This extension is reasonable and necessary given the good cause set forth above.

**IT IS SO STIPULATED.**

Dated: November 13, 2017

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**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES MAGISTRATE JUDGE

DATED: November 28, 2017